


EXHIBIT B

Feller, et. al. v. Alliance Entertainment, et. al. - Discovery and Case Management



Arun Ravindran <aravindran@hedinllp>

To:  Griswold, Joel C.;  DelGobbo, Bonnie KeaneCc:  Frank Hedin;  jholt@hedinllp.com;  Elliot Jackson Reply Reply All Forward

Thu 10/10/2024 5:34 PM

 You replied to this message on 10/11/2024 3:47 PM.**[External Email: Use caution when clicking on links or opening attachments.]**

Good Evening Bonnie and Joel,

Plaintiffs served initial discovery requests on September 12, 2024. Plaintiff also provided its Rule 26(a) initial disclosures on September 12, 2024. Plaintiff agreed to Defendants' request to pause its obligation to respond to discovery on September 17, 2024 pending the mediation. As such, I calculate the date for Defendants' discovery responses as **November 4, 2024**.

Defendants served discovery on October 4, 2024 during the agreed discovery pause. As set forth in my email of October 5, 2024, Plaintiffs understand their discovery response date to **November 11, 2024**, the Monday after November 9, 2024.

Plaintiff requested on September 12, 2024 that Defendant make its Rule 26 initial disclosures by September 19, 2024. Defendants did not respond to that request. Plaintiffs request that Defendant make its initial disclosures by **Monday October 14, 2024**. If Defendant will not produce its initial disclosures by then, Plaintiffs seek to confer. I am available all day tomorrow.

With respect to the other dates please advise if Defendants have a different view.

Plaintiff will be seeking to modify the deadline to file an amended complaint by 60 days and all other court ordered deadlines by 30 days to account for the roughly one-month period pending mediation. Please advise Defendants' position.

Further, Plaintiff will be seeking to re-notice Defendants' corporate representative deposition to occur two weeks from November 15, 2024, on or about December 2, 2024. Please let us know availability so we can coordinate the exact date and time.

Thanks very much,

Arun G. Ravindran

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